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Hon. Stewart D. Aaron
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Zagado v. Commissioner of Social Security
Civil Action No: 1:20-cv-09449-LJL-SDA

Dear Judge Aaron:

This letter respectfully requests an extension of time of sixty (60) days for Plaintiff to serve his Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on August 16, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare his Motion. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **October 15, 2021**. Subsequently, in accordance with the pattern of the Standing Order, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due **December 14, 2021**. Plaintiff's Reply would then be due **January 4, 2022**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.

Bar Code H06529

Counsel for Plaintiff

CC [via ECF]: Amanda F. Parsels (Counsel for Defendant)

SO ORDERED.

Dated: August 10, 2021

New York, NY

Honorable Stewart D. Aaron
U.S. Magistrate Judge